

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Leslie Burke,

Debtor.

Case No. 21-12238-AMC

Chapter 13

Motion to Modify Plan After Confirmation

Debtor Leslie Burke, through her attorney, moves this Court as follows:

1. The Plan was confirmed on February 27, 2022.
2. The Debtor wishes to amend the plan to include post-petition mortgage arrears consistent with the stipulation filed at ECF No. 78 that was approved by the Court's order filed at ECF No. 79, and to surrender her car to the lender.
3. The Debtor therefore requests approval of the Fourth Amended Plan filed at ECF No. 81.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: December 9, 2024

CIBIK LAW, P.C.
Attorney for Debtor

By: /s/ Michael A. Cibik

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